

REMARKS

In the Office Action mailed on November 22, 1999, the Examiner rejected claims 1-34 under 35 U.S.C. §103(a) over Kazan in view of Pearlman et al., and claim 29 under 35 U.S.C. §112, second paragraph. We have canceled claim 29, obviating the latter rejection.

With respect to the substantive rejections, we submit that the structure disclosed by Kazan differs substantially from the requirements of the present claims. With reference to FIG. 4 of Kazan, the patent discloses fabrication of a structure beginning with a polymer sheet 13 containing encapsulated liquid crystal elements 12 (col. 5, lines 32-34). On a first side of the sheet 13, a set of upper electrodes 17, electrode leads 23 and nonlinear resistors 14, 16 are formed. On the opposite side of the sheet, electrode strips 15 are formed.

Thus, in accordance with Kazan, the electrodes directly sandwich the display elements, and the nonlinear elements lie between one set of electrodes and the leads thereto. The present invention, by contrast, concerns a structure in which the nonlinear elements intervene between and couple the two sets of electrodes, as shown in FIG. 1. Thus, claim 1 expressly requires the display and nonlinear elements to be "disposed between the first and second sets of electrodes so as to couple at least some electrodes of the first set with corresponding electrodes of the second set at regions of intersection."

The claimed structure not only differs from that disclosed in Kazan, but offers particular advantages as well. As shown in FIG. 4B of the present application and as described in the accompanying text at pages 20-22, this structure allows the various compo-

nents—electrodes, displays, nonlinear elements—to be sequentially deposited as separate layers. The Kazan approach, by contrast, requires leads 23A and 23B, resistors 14 and 16, and electrodes 17 to be formed as separate elements on the same surface.

Pearlman et al. do not even contemplate nonlinear elements, and therefore cannot supply what Kazan lacks in this regard. But it is noteworthy that in the Pearlman et al. patent, the display elements are, as in Kazan, immediately sandwiched by opposing electrodes.

In light of the foregoing, we submit that all claims are now in condition for allowance. Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,



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